

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GREGORY MANGO

Plaintiff,

- against -

BUZZFEED, INC.

Defendant.

Case No. 1:17-cv-06784 (VM)

**DECLARATION OF
JAMES H. FREEMAN**

I, JAMES H. FREEMAN, hereby declare under the penalty of perjury that the following statements are true and correct to the best of my personal knowledge.

1. I am counsel for Plaintiff Gregory Mango (“Plaintiff” or “Mango”) in the above-referenced action and admitted to practice law in this District.

2. Pursuant to the Court’s Order, dated March 11, 2019 [Dkt. #70], I respectfully submit the following documents to supplement the District Court’s record.

Pre-Trial Submissions

3. Attached as Exhibit A is a true and correct copy of the [Proposed] Joint Pre-Trial Order, as amended and e-mailed to the Court on July 13, 2018.

4. Attached as Exhibit B is a true and correct copy of Plaintiff’s Proposed Findings of Fact and Conclusions of Law, as amended and e- mailed to the Court on July 13, 2018.

5. Attached as Exhibit C is a true and correct copy of Defendant’s Proposed Findings of Fact and Conclusions of Law, as amended and e-mailed to the Court on July

13, 2018.

6. Attached as Exhibit D is a true and correct copy of Plaintiffs Pre-Trial Memorandum of Law, as e-mailed to the Court on June 4, 2018.

7. Attached as Exhibit E is a true and correct copy of Defendant's Pre-Trial Memorandum of Law, as amended and e-mailed to the Court on July 13, 2018.

Plaintiff's Trial Exhibits

8. Attached as Exhibit F is a true and correct copy of Plaintiff's Trial Exhibit 13 (including enlarged version used at trial).

9. Attached as Exhibit G is a true and correct copy of Plaintiff's Trial Exhibit 17.

10. Attached as Exhibit H is a true and correct copy of Plaintiff's Trial Exhibit 20.

11. Attached as Exhibit I is a true and correct copy of Plaintiff's Trial Exhibit 37.

12. Attached as Exhibit J is a true and correct copy of Plaintiff's Trial Exhibit 38.

13. Attached as Exhibit K is a true and correct copy of Plaintiff's Trial Exhibit 73.

14. Attached as Exhibit L is a true and correct copy of Plaintiff's Trial Exhibit 74.

15. Attached as Exhibit M is a true and correct copy of Plaintiff's Trial Exhibit 75.

16. Attached as Exhibit N is a true and correct copy of Plaintiff's Trial Exhibit 76.

17. Attached as Exhibit O is a true and correct copy of Plaintiff's Trial Exhibit 77 (including enlarged version used at trial).

18. Attached as Exhibit P is a true and correct copy of Plaintiff's Trial Exhibit 78.

19. Attached as Exhibit Q is a true and correct copy of Plaintiff's Trial Exhibit 79.

20. Attached as Exhibit R is a true and correct copy of Plaintiff's Trial Exhibit 81.

21. Attached as Exhibit S is a true and correct copy of Plaintiff's Trial Exhibit 85.

- 22. Attached as Exhibit T is a true and correct copy of Plaintiff's Trial Exhibit 88.
- 23. Attached as Exhibit U is a true and correct copy of Plaintiff's Trial Exhibit 89.
- 24. Attached as Exhibit V is a true and correct copy of Plaintiff's Trial Exhibit 90.
- 25. Attached as Exhibit W is a true and correct copy of Plaintiff's Trial Exhibit 91.
- 26. Attached as Exhibit X is a true and correct copy of Plaintiff's Trial Exhibit 96.

Defendant's Trial Exhibits

27. According to my review of the hearing transcript from the August 13, 2018 bench trial, the following exhibits were admitted into evidence by Defendant: Defendant's Exhibits A, B, and L.

28. Pursuant to the Stipulated Protective Order, Defendant's Exhibit B must be filed under seal. As such, I defer to defense counsel to file Defendant's admitted trial exhibits marked Exhibit A, Exhibit B and Exhibit L consistent with the terms of the Protective Order.

Dated: April 23, 2019
Valley Stream, New York

By: /s/jameshfreeman
James H. Freeman

Attorneys for Plaintiff
Gregory Mango

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of this Declaration of James H. Freeman, dated April 23, 2019, and all exhibits attached hereto were served upon counsel below on April 23, 2019 as follows:

1) Eleanor M. Lackman, Esq. via CM/ECF

Counsel or record for Defendant BuzzFeed, Inc. in S.D.N.Y.

2) Michelle Mancino Marsh, Esq. - Michelle.Marsh@arentfox.com

Counsel or record for Appellant-Defendant BuzzFeed, Inc. in Second Circuit

/s/jameshfreeman
James H. Freeman